

1 BOIES SCHILLER FLEXNER LLP  
2 RICHARD J. POCKER (NV Bar No. 3568)  
3 300 South Fourth Street, Suite 800  
4 Las Vegas, NV 89101  
5 Telephone: 702.382.7300  
6 Facsimile: 702.382.2755  
7 rpocker@bsfllp.com

8 BOIES SCHILLER FLEXNER LLP  
9 WILLIAM ISAACSON (*pro hac vice*)  
10 KAREN DUNN (*pro hac vice*)  
11 1401 New York Avenue, NW, 11th Floor  
12 Washington, DC 20005  
13 Telephone: (202) 237-2727  
14 Facsimile: (202) 237-6131  
15 wisaacson@bsfllp.com  
16 kdunn@bsfllp.com

17 BOIES SCHILLER FLEXNER LLP  
18 STEVEN C. HOLTZMAN (*pro hac vice*)  
19 BEKO O. REBLITZ-RICHARDSON  
20 (*pro hac vice*)  
21 1999 Harrison Street, Suite 900  
22 Oakland, CA 94612  
23 Telephone: 510.874.1000  
24 Facsimile: 510.874.1460  
25 sholtzman@bsfllp.com  
26 brichardson@bsfllp.com

27 *Attorneys for Counterclaimant Oracle America, Inc. and  
28 Defendant and Counterclaimant Oracle International Corp.*

1 MORGAN, LEWIS & BOCKIUS LLP  
2 THOMAS S. HIXSON (*pro hac vice*)  
3 JOHN A. POLITICO (*pro hac vice*)  
4 FRANK KENNAMER (*pro hac vice*)  
5 One Market, Spear Street Tower  
6 San Francisco, CA 94105  
7 Telephone: 415.442.1000  
8 Facsimile: 415.442.1001  
9 thomas.hixson@morganlewis.com  
10 john.polito@morganlewis.com  
11 nitin.jindal@morganlewis.com

12 DORIAN DALEY (*pro hac vice*)  
13 DEBORAH K. MILLER (*pro hac vice*)  
14 JAMES C. MAROULIS (*pro hac vice*)  
15 ORACLE CORPORATION  
16 500 Oracle Parkway, M/S 5op7  
17 Redwood City, CA 94070  
18 Telephone: 650.506.4846  
19 Facsimile: 650.506.7114  
20 dorian.daley@oracle.com  
21 deborah.miller@oracle.com  
22 jim.maroulis@oracle.com

23 RIMINI STREET, INC., a Nevada corporation;

24 Plaintiff,

25 v.

26 ORACLE INTERNATIONAL CORPORATION,  
27 a California corporation, and ORACLE  
28 AMERICA, INC., a Delaware corporation,

Defendants.

1 ORACLE AMERICA, INC., a Delaware  
2 corporation, and ORACLE INTERNATIONAL  
3 CORPORATION, a California corporation,

4 Counterclaimants,

5 v.

6 RIMINI STREET, INC., a Nevada corporation;  
7 SETH RAVIN, an individual,

8 Counterdefendants.

Case No. 2:14-cv-01699 LRH CWH

1 **DECLARATION OF BEKO REBLITZ-  
2 RICHARDSON IN SUPPORT OF  
3 OPPOSITION TO RIMINI STREET INC.  
4 AND SETH RAVIN'S MOTION TO  
5 COMPEL REGARDING  
6 INTERROGATORY NO. 35**

1 I, Beko Reblitz-Richardson, declare as follows:

2 1. I am an attorney admitted to practice law in the State of California and before the  
3 Court in this action *pro hac vice*. I am a partner with Boies Schiller Flexner LLP, counsel to  
4 Defendants and Counterclaimants Oracle America, Inc. and Oracle International Corporation  
5 (collectively “Oracle”) in this action. I make this declaration in support of Oracle’s Opposition  
6 to Rimini Street Inc. and Seth Ravin’s Motion to Compel Regarding Interrogatory No. 35 (the  
7 “Motion”). I have firsthand knowledge of the contents of this declaration and I could testify  
8 thereto.

9 2. During a meet and confer call on March 22, 2018, I understand that counsel for  
10 Rimini stated that Rimini was unsatisfied with Oracle’s February 28, 2018 Amended Response  
11 to Interrogatory No. 35. I further understand that Oracle’s counsel offered to further examine  
12 Rimini’s concerns but that Rimini considered the parties to be at an impasse if Oracle did not  
13 immediately supplement its response.

14 3. Attached as Exhibit A is a true and correct excerpted copy of the transcript of the  
15 February 15, 2018 deposition of Seth Ravin. [Filed Under Seal]

16 4. Attached as Exhibit B is a true and correct excerpted copy of the transcript of the  
17 May 17, 2016 deposition of Steven Salaets pursuant to Federal Rule of Civil Procedure 30(b)(6).  
18 [Filed Under Seal]

19 5. Attached as Exhibit C is a true and correct excerpted copy of the trial transcript  
20 from *Rimini I* for September 23, 2015.

21 6. Attached as Exhibit D is a true and correct copy of a document titled “Seth A.  
22 Ravin Employment Agreement”, hosted on the website of the U.S. Securities and Exchange  
23 Commission at the URL <https://www.sec.gov/Archives/edgar/data/1415610/000095012313008372/filename6.htm>, and last accessed on April 2, 2018.

25 7. Attached as Exhibit E is a true and correct copy of an email from Seth Ravin to  
26 Emily Terry, dated February 5, 2015, and bearing the Bates number RSI2\_012777267. [Filed  
27 Under Seal]

8. Attached as Exhibit F is a true and correct copy of a letter from Seth Ravin addressed to "Rimini Street Client", dated August 14, 2014, produced in its native format and bearing the Bates number RSI2\_SF\_000031172. [Filed Under Seal]

9. Attached as Exhibit G is a true and correct copy of an email from Ray Grigsby to Seth Ravin, dated June 22, 2012, and bearing the Bates number RSI2\_012752184. [Filed Under Seal]

10. Attached as Exhibit H is a true and correct copy of an email from David Rowe to Seth Ravin, dated November 28, 2012, and bearing the Bates number RSI2\_017249642. This document was identified as Deposition Exhibit 1851 in the February 15, 2018 deposition of Seth Ravin. [Filed Under Seal]

11. Attached as Exhibit I is a true and correct copy of an email from Chris Limburg to John Royse, dated March 9, 2010, and bearing the Bates number RSI04026526. This document was identified as Plaintiffs' Exhibit 65 in the *Rimini I* trial.

12. Attached as Exhibit J is a true and correct copy of an email from Seth Ravin to Beth Schnitger, dated July 27, 2015, and bearing the Bates number RSI2\_013411087. [Filed Under Seal]

I declare that the foregoing is true under penalty of perjury of the laws of the United States.

Executed this 11th day of April, 2018 at Oakland, California.

BOIES SCHILLER FLEXNER LLP

By: /s/ Beko O. Reblitz-Richardson  
BEKO O. REBLITZ-RICHARDSON

Attorneys for Defendants and Counterclaimants Oracle America, Inc. and Oracle International Corporation

**CERTIFICATE OF SERVICE**

I certify that on April 11, 2018, I electronically transmitted the foregoing

**DECLARATION OF BEKO REBLITZ-RICHARDSON IN SUPPORT OF OPPOSITION  
TO RIMINI STREET INC. AND SETH RAVIN'S MOTION TO COMPEL REGARDING  
INTERROGATORY NO. 35** to the Clerk's Office using the Electronic Filing System pursuant  
to Local Rules Section 1C.

Dated: April 11, 2018

## BOIES SCHILLER FLEXNER LLP

By: /s/ *Ashleigh Jensen*  
Ashleigh Jensen